

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

LAUREN ADELE OLIVER,  
an individual,

Plaintiff,

v.

Case No. 1:20-CV-00237-KK-SCY

MEOW WOLF, INC., a Delaware  
corporation; VINCE KADLUBEK,  
an individual and officer; and  
DOES 1-50,

Defendants.

**UNOPPOSED MOTION TO EXTEND MOTION TO COMPEL DEADLINE**

Defendants Meow Wolf, Inc. and Vince Kadlubeck (collectively, “Defendants”), through their undersigned counsel, hereby move for an extension of the Motion to Compel deadline by thirteen (13) days and as grounds therefore state:

1. Defendant Meow Wolf, Inc. served Plaintiff Lauren Adele Oliver with discovery on March 23, 2021.
2. Plaintiff Lauren Adele Oliver served objections and responses to discovery on April 22, 2021.
3. Pursuant to D.N.M.LR-Civ. 26.6, Defendants must file their motion to compel by May 13, 2021.
4. The parties are continuing their attempts to resolve the objections and therefore request that the Court grant a thirteen (13) day extension of the deadline under D.N.M.LR-Civ. 26.6.
5. Plaintiff approves this extension.

For the foregoing reasons, the parties respectfully request that the Court extend the deadline to file motions to compel, if such motions are necessary, by thirteen (13) days up to and including May 26, 2021.

Dated: May 13, 2021

Respectfully submitted,

BARDACKE ALLISON LLP

/s/ Breanna Contreras

Benjamin Allison

Breanna Contreras

P.O. Box 1808

141 East Palace Avenue

Santa Fe, New Mexico 87504-1808

(505) 995-8000

[ben@bardackeallison.com](mailto:ben@bardackeallison.com)

[breanna@bardackeallison.com](mailto:breanna@bardackeallison.com)

*Attorneys for Defendants Meow Wolf, Inc.  
and Vince Kadlubeck*

Approved by:

ERICKSEN ARBUTHNOT

By: /s/ Jesse A. Boyd

*(approved via email 5/13/21)*

JESSE A. BOYD

ANDREW J. CHAN

2300 Clayton Road, Suite 350

Concord, California 94520

(510) 832-7770

(510) 832-0102 facsimile

[jboyd@ericksenarbuthnot.com](mailto:jboyd@ericksenarbuthnot.com)

[achan@ericksenarbuthnot.com](mailto:achan@ericksenarbuthnot.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of May, 2021, a true and correct copy of the foregoing document was served via CM/ECF on all interested parties. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants: N/A.

/s/ Breanna Contreras

Breanna Contreras